

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CARPENTER'S LOCAL UNION 792,)	
affiliated with the CHICAGO REGIONAL)	
COUNCIL OF CARPENTERS, UNITED)	
BROTHERHOOD OF CARPENTERS)	Case No.
AND JOINERS OF AMERICA,)	
)	Judge
Plaintiff,)	
)	
v.)	
)	
Comprehensive Community Solutions, Inc.,)	
a/k/a CCS, Inc.,)	
)	
Defendants.)	

COMPLAINT FOR JUDGMENT ON AN ARBITRATION AWARD

NOW COMES the plaintiff, the CARPENTER'S LOCAL 792, by its attorney, Raymond J. Sanguinetti of the Law Firm of Whitfield, McGann & Ketterman, and for its Complaint for Judgment on an Arbitration Award states as follows:

1. This is an action brought by CARPENTER'S LOCAL 792 to enforce an arbitration award.
2. Plaintiff, CARPENTER'S LOCAL 792 ("Union"), is an unincorporated voluntary association, with its principal place of business at 212 South First Street, Rockford, Illinois. The Union is a labor organization as defined under Section 301 of the Labor Management Relations Act, as amended, 29 U.S.C. § 185.
3. Defendant, Comprehensive Community Solutions, Inc. a/k/a CCS, Inc. is operating in Illinois as a corporation that performs work in Illinois within the Northern District of Illinois and is an employer engaged in an industry affecting commerce, within the meaning of 29 U.S.C. §185.

4. This Court has jurisdiction of this action, pursuant to Section 301 of 29 U.S.C. §185, as a suit for violation of a collective bargaining agreement between an employer and a labor organization representing employees in an industry affecting commerce. This Court also has jurisdiction of this action, pursuant to the United States Arbitration Act, 9 U.S.C.S. §9, as a suit for confirmation of an arbitration award.

5. Venue is proper in the Northern District of Illinois, Eastern Division, pursuant to 29 U.S.C. §185, because this is where the cause of action arose, where the Defendant has performed work, and where representatives of the Union are engaged in representing or acting for their members. Venue is also proper in the Northern District of Illinois, Eastern Division, pursuant to 9 U.S.C.S. §9, as the arbitration award was made in this District.

6. Defendant entered into an Agreement whereby it agreed to be bound by the provisions of a Collective Bargaining Agreement ("CBA") that defined the wages and benefits to be paid Union employees under the employ of defendants.

7. The Agreement, through the CBA, also binds the defendant to the grievance procedure and to final and binding arbitration.

8. A hearing was held pursuant to the CBA, and on March 4, 2010 an award was entered in favor of CARPENTER'S LOCAL 792 and against Defendants in the amount of \$48,785.76. (Exhibit A)

9. Demand was made upon Defendants for payment, and no part of said indebtedness has been paid.

WHEREFORE, for the foregoing reasons, Plaintiff prays that this Honorable Court:

A. Enter Judgment against C.C.S. Construction, LLC, d/b/a Comprehensive Community Solutions, Inc. a/k/a CCS, Inc. jointly and severally in the amount of \$48,785.76.

B. Grant plaintiff such other and further relief as the Court deems just and equitable.

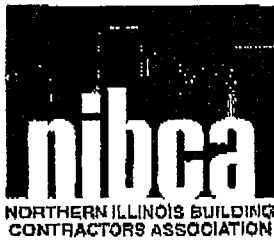
CARPENTER'S LOCAL 792 affiliated with the
CHICAGO REGIONAL COUNCIL OF
CARPENTERS, UNITED BROTHERHOOD OF
CARPENTERS AND JOINERS OF AMERICA,

By: s/Raymond J. Sanguinetti
Raymond J. Sanguinetti

WHITFIELD, MCGANN & KETTERMAN
Attorney for Plaintiffs
111 East Wacker Drive, Suite 2600
Chicago, IL 60601
312/251-9700
Atty. No. 6244798
File N8393

Exhibit A

Exhibit A




March 4, 2010

A grievance on behalf of the Chicago Regional Council of Carpenters Local 792 having been heard, with the Union appearing and presenting evidence, the following findings of fact and award are made:

1. We find that C.C.S. Construction, LLC is currently operating as Comprehensive Community Solutions, Inc. a/k/a CCS, Inc. and that Comprehensive Community Solutions, Inc. a/k/a CCS, Inc. is bound to the Collective Bargaining Agreement between the Chicago Regional Council of Carpenters Local 792 and the Northern Illinois Building Contractors Association.
2. We further find that C.C.S. Construction, LLC and Comprehensive Community Solutions, Inc. a/k/a CCS, Inc. has and continues to perform the jurisdictional work of the Chicago Regional Council of Carpenters Local 792 at a jobsite located at 721 Pearl Avenue, Loves Park, IL, commonly known as the Old Hines Lumber Co.
3. Additionally we find that C.C.S. Construction, LLC and Comprehensive Community Solutions, Inc. a/k/a CCS, Inc. have violated Article IX Section 1 and 2 of the CBA by failing to pay the proper wages and premiums.

WHEREFORE, the grievance against C.C.S. Construction, LLC d/b/a Comprehensive Community Solutions Inc. a/k/a CCS, Inc. is sustained, and an award of \$48,785.76 is entered in favor of the Chicago Regional Council of Carpenters Local 792 and against C.C.S. Construction, LLC d/b/a Comprehensive Community Solutions, Inc. a/k/a CCS, Inc.


Glen L. Turpoff
Secretary of Joint Grievance Committee